

Tab A

Case No. 23-10171

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

HAVANA DOCKS CORPORATION,
Plaintiff-Appellee; Cross-Appellant,

v.

ROYAL CARIBBEAN CRUISES, LTD., NORWEGIAN CRUISE LINE HOLDINGS, LTD.,
CARNIVAL CORPORATION, a foreign corporation doing business as Carnival Cruise
Lines, MSC CRUISES S.A. Co., MSC CRUISES (USA), INC., et al.
Defendants-Appellants; Cross-Appellees.

On Appeal From The United States District Court For The
Southern District Of Florida (Hon. Beth Bloom)
Case No. 1:19-cv-23591-BLOOM

**JOINT AND UNOPPOSED MOTION FOR LEAVE TO INCREASE THE
WORD LIMIT FOR THE JOINT OPENING BRIEF OF
DEFENDANTS-APPELLANTS NORWEGIAN CRUISE LINE HOLDINGS,
LTD, ROYAL CARIBBEAN CRUISES, LTD, MSC CRUISES S.A. CO., MSC
CRUISES (USA), INC., AND MSC CRUISES, S.A**

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who are members of the Virginia bar

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SUTCLIFFE LLP
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Katherine Munyan
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SUTCLIFFE LLP
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*Counsel for Defendants-Appellants MSC Cruises S.A. Co., MSC Cruises
(USA), Inc., and MSC Cruises, S.A.*

**AMENDED CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE DISCLOSURE STATEMENT**

Under Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rules 26.1-1 through 26.1-3, undersigned counsel hereby certifies that the following persons and entities have an interest in the outcome of this appeal:

1972 Productions, Inc.

A.C.N. 098 290 834 Pty. Ltd.

A.J. Juneau Dock, LLC

Admiral Management Inc.

Adventure Island Ltd.

Adventure of the Seas Inc.

AIDA Kundencenter GmbH

AIDAradio GmbH

Air-Sea Holiday GmbH

Alaska Hotel Properties LLC

Allure of the Seas Inc.

Anthem of the Seas Inc.

Akerman LLP

Arrasas Limited

Baldrige, J. Douglas (Venable LLP)

Balmori, Daniel (Hogan Lovells US LLP)

Barcelona Cruise Terminal SLU

Bash III, John F. (Quinn Emanuel Urquhart & Sullivan, LLP)

Bay Island Cruise Port, S.A.

Behn, Aphra

Behn, Mickael

Behn-Lucain, Melanie

Belize Cruise Terminal Limited

Belize Investments Limited

Belize Island Holdings Ltd.

Bermuda Tenders, Ltd.

Black, Hillary S. (Paul, Weiss, Rifkind, Wharton & Garrison LLP)

Bloom, Judge Beth F. (United States District Judge for the Southern District
of Florida)

Bluvacanze Spa

Bohrer, Sanford L.

Boies Schiller Flexner LLP

Breakaway Four, Ltd.

Breakaway One, Ltd.

Breakaway Three, Ltd.

Breakaway Two, Ltd.

Brilliance of the Seas Shipping Inc.

Buffett, Warren E.

Burck, William A. (Quinn Emanuel Urquhart & Sullivan, LLP)

Caluda, Nicholas J. (Quinn Emanuel Urquhart & Sullivan, LLP)

Canodros CL

Carnival (UK) Limited

Carnival Bahamas FC Limited Bahamas

Carnival Bahamas Holdings Limited

Carnival Corporation (CCL)

Carnival Corporation & plc Asia Pte. Ltd.

Carnival Corporation Hong Kong Limited

Carnival Corporation Korea Ltd.

Carnival Corporation Ports Group Japan KK

Carnival Finance, LLC

Carnival Grand Bahama Investment Limited

Carnival Holdings (Bermuda) Limited

Carnival Investments Limited

Carnival Japan, Inc.

Carnival License Holdings Limited

Carnival Maritime GmbH

Carnival North America LLC

Carnival PLC

Carnival Port Holdings Limited

Carnival Ports Inc.

Carnival Support Services India Private Limited

Carnival Technical Services (UK) Limited

Carnival Technical Services Finland Limited

Carnival Technical Services GmbH

Carnival Vanuatu Limited

Casey, Stephanie A. (Colson Hicks Eidson, P.A.)

CC U.S. Ventures, Inc.

CCL Gifts, LLC

Celebrity Apex Inc.

Celebrity Cruise Lines Inc.

Celebrity Cruises Holdings Inc.

Celebrity Cruises Inc. (d/b/a Celebrity Cruises Liberia)

Celebrity Eclipse Inc.

Celebrity Edge Inc.

Celebrity Equinox Inc.

Celebrity Reflection Inc.

Celebrity Silhouette Inc.

Celebrity Solstice Inc.

Cisalpina Tours Spa

Classic Cruises, LLC

Classic Cruises II, LLC

Clement & Murphy, PLLC

Clement, Paul D. (Clement & Murphy, PLLC)

CNS Compañia Naviera Seaside 1 SA

Colson Hicks Eidson, P.A.

Compañia Naviera Evo 1 SA

Compañia Naviera Evo 2 SA

Compañia Naviera Fantasia SA

Compañia Naviera Meraviglia SA

Compañia Naviera Musica SA

Compania Naviera Ocean Cay SA

Compañia Naviera Orchestra SA

Compañia Naviera Pacifica S.A.

Compañia Naviera Preziosa SA

Compañia Naviera Seaside 2 SA

Compañia Naviera Serenata SA

Compañia Naviera Vista 1 SA

Compañia Naviera Vista 2 SA

Compañia Naviera Vista 3 SA

Compañia Naviera Vista 4 SA

Compañia Naviera Vista 5 SA

Compañia Naviera World Class 1 SA

Compañia Naviera World Class 2 SA

Compañia Naviera World Class 3 SA

Compañia Naviera World Class 4 SA

Compañia Naviera Yc1 SA

Compañia Naviera Yc2 SA

Compañia Naviera Yc3 SA

Compañia Naviera Yc4 SA

Compañia Naviera Yc5 SA

Compañia Naviera Yc6 SA

Constellation Inc. Liberia

Cooke, Judge Marcia G. (United States District Judge for the Southern

District of Florida)

Cooper, Jonathan G. (Quinn Emanuel Urquhart & Sullivan, LLP)

Costa Crociere PTE Ltd.

Costa Crociere S.p.A.

Costa Cruceros S.A.

Costa Cruise Lines Inc.

Costa Cruise Lines UK Limited

Costa Cruises Customer Center S.L.U.

Costa Cruises Shipping Services (Shanghai) Company Limited

Costa Cruises Travel Agency (Shanghai) Co., Ltd.

Costa Cruises Turkey Turizm Gelisim A.S.

Costa Cruzeiros Agencia Maritima e Turismo Ltda.

Costa International B.V.

Costa Kreuzfahrten GmbH

Cozumel Cruise Terminal S.A. de C.V.

Cruise Administration Services, Inc.

Cruise Conglomerate Maritime Ltd.

Cruise Lines International Association

Cruise Quality Travel Spain SL

Cruise Ships Catering & Services International N.V.

Cruise Terminal Services, S.A. de C.V.

Cruiseport Curacao C.V.

CSMART Real Estate B.V.

CSMART Real Estate C.V.

D.R. Cruise Port, Ltd.

Elayan-Martinez, Aziza F. (Colson Hicks Eidson, P.A.)

Ellis George Cipollone O'Brien Annaguey, LLP

Enchantment of the Seas Inc.

Eurosoft Corporation Limited

Eurosoft Cruise Line (Shanghai) Co., Ltd.

Explora SA

Explorer II New Build, LLC

Explorer III New Build, LLC

Explorer New Build, LLC

Explorer of the Seas Inc.

F.P.M. SAS

F.P.P. SAS

Fields, Lazaro (Continental PLLC)

Fleet Maritime Services (Bermuda) Limited

Fleet Maritime Services Holdings (Bermuda) Limited

Fleet Maritime Services International Limited

Foreman Friedman, PA

Fowler III, George J (Jones Walker LLP)

Freedom of the Seas Inc.

Freyre, Pedro A. (Akerman LLP)

Friedman, Darren Wayne (Foreman Friendman)

Future Investments, Ltd.

Gayles, Judge Darrin P. (United States District Judge for the Southern
District of Florida)

GG Operations Inc.

Gibs, Inc.

Global Experience Innovators, Inc.

Global Fine Arts, Inc.

Global Fleet Management LLC

Global Fleet Management Two LLC

Global Shipping Service (Shanghai) Co., Ltd.

Going Srl

Goodman, Judge Jonathan (United States Magistrate Judge for the Southern
District of Florida)

Goulette Cruise Holding Limited

Grand Cruise Shipping Unipessoal Lda

Grand Turk Cruise Center Ltd.

Grandeur of the Seas Inc.

Gray, Corey P. (Boies Schiller Flexner LLP)

Great Stirrup Cay Limited

Greensboro S.L.

Gwart Srl

GXI, LLC D

HAL Antillen N.V.

HAL Beheer B.V.

HAL Maritime Ltd.

HAL Nederland N.V.

HAL Properties Limited

HAL Services B.V.

Harmony of the Seas Inc.

Harper, Chadwick (Clement & Murphy, PLLC)

Harvard Law School

Havana Docks Corporation

Hernacki, Andrew T. (Venable LLP)

Hoch, Dorothy

Hogan Lovells US LLP

Holding Division Iberocruceros SLU

Holland & Knight LLP

Holland America Line Inc.

Holland America Line N.V.

Holland America Line U.S.A., Inc.

Hospedagm De Pomene (Mozambique) Lda

HSE Hamburg School of Entertainment GmbH

Ibero Cruzeiros Ltda.

Iberocruceros SLU

Independence of the Seas Inc.

Infinity Inc.

Information Assistance Corporation

Insignia Vessel Acquisition, LLC

International Cruise Services, S.A. de C.V.

International Leisure Travel Inc.

International Maritime Recruitment Agency, S.A. de C.V.

Island for Science, Inc.

Islas Galapagos Turismo y Vapores CA

Jewel of the Seas Inc.

Johnson, Jerry M.

Jones Walker LLP

Klinger, Richard D. (Ellis George Cipollone O'Brien Annaguey, LLP)

Kroeger, Thomas (Colson Hicks Eidson, P.A.)

Krystalsea Limited

Kwazulu Cruise Terminal (Pty) Ltd.

Labadee Investments Ltd.

Landau, Christopher (Ellis George Cipollone O'Brien Annaguey, LLP)

Leonardo Five, Ltd.

Leonardo Four, Ltd.

Leonardo One, Ltd

Leonardo Six, Ltd.

Leonardo Three, Ltd.

Leonardo Two, Ltd.

Li, Vincent (Ellis George Cipollone O'Brien Annaguey, LLP)

Liberia

Liberty of the Seas Inc.

Lindsay III, Alvin Francis (Hogan Lovells US LLP)

Lipshultz, Zachary A. (Colson Hicks Eidson, P.A.)

Lipshutz, Brian M. (Paul, Weiss, Rifkind, Wharton & Garrison LLP)

Llamas, Luis E. (Jones Walker LLP)

Loeb, Robert (Orrick, Herrington & Sutcliffe LLP)

Lorenzo, Richard C. (Hogan Lovells US LLP)

Louis, Judge Lauren Fleischer (United States Magistrate Judge for the
Southern District of Florida)

Lutz, Zachary P. (Quinn Emanuel Urquhart & Sullivan, LLP)

MacArthur Trust

Maderal, Francisco

Margol & Margol, P.A.

Margol, Rodney S. (Margol & Margol, P.A.)

Marina New Build, LLC

Mariner of the Seas Inc.

Mariner, LLC

Marseille Provence Cruise Terminal SAS

Martinez, Judge Jose E. (United States District Judge for the Southern
District of Florida)

Martínez, Roberto (Colson Hicks Eidson, P.A.)

Massey & Gail LLP

Massey, Johnathan S. (Massey & Gail LLP)

McAliley, Judge Chris M. (United States Magistrate Judge for the
Southern District of Florida)

Mediterranean Cruises Travel Agency (Shanghai) Co Ltd

Michel, Christopher G. (Quinn Emanuel Urquhart & Sullivan, LLP)

Milestone N.V.

Millennium Inc.

Moriceau, Alisha (Boies Schiller Flexner LLP)

MSC Crewing Services Philippines

MSC Cruceros SA Argentina

MSC Cruceros SA Spain

MSC Cruise Management (UK) Ltd

MSC Cruises (Australia) Pty Ltd

MSC Cruises (Canada) Ltd

MSC Cruises (Ireland) Ltd

MSC Cruises (USA), Inc.

MSC Cruises Asia Company Ltd.

MSC Cruises Barcelona Terminal SL

MSC Cruises Belgium NV

MSC Cruises Gmbh

MSC Cruises Japan Ltd

MSC Cruises Limited UK

MSC Cruises Ltd Cyprus

MSC Cruises S.A. Co.

MSC Cruises Scandinavia AB

MSC Cruises Ship Management (Shanghai) Ltd.

MSC Cruises Shipping Service (Shanghai) Ltd.

MSC Cruises The Netherlands BV

MSC Cruises, S.A.

MSC Cruzeiros Do Brasil Ltda

MSC Cruzeiros SA

MSC Food & Beverage Division Spa

MSC Italcatering Do Brasil Ltda

MSC Kreuzfahrten (Austria) Gmbh

MSC Kreuzfahrten AG

MSC Krstarenja Doo

MSC Kruvaziyer Turizm AS

MSC Logistics (Mozambique) Ltd.

Msc Malta Seafarers Company Ltd.

MSC Mediagrafica Srl

MSC Miami Cruise Terminal LLC

MSC Ocean Cay Ltd

MSC Starlight Cruises Pty Ltd

Munyan, Katherine (Orrick, Herrington & Sutcliffe LLP)

Musica Cruise Limited

Nautica Acquisition, LLC

Navigator of the Seas Inc.

Navigator Vessel Company, LLC

Navitrans S.R.L.

NCL (Bahamas) Ltd. d/b/a Norwegian Cruise Line

NCL (Guernsey) Limited

NCL America Holdings, LLC

NCL America LLC

NCL Australia Pty Ltd.

NCL Construction Corp., Ltd.

NCL Corporation Ltd.

NCL Cruises Ltd.

NCL Emerald Corporation, Limited

NCL Finance, Ltd.

NCL HK Holding, Ltd.

NCL Holding AS

NCL Hong Kong Limited

NCL International, Ltd.

NCL Japan KK

NCL Singapore Pte. Ltd.

NCL UK IP CO LTD

NCL US IP CO 1, LLC

NCL US IP CO 2, LLC

NCLC Investments Canada Ltd.

NCLM Limited

Nemeroff, Justin B. (Venable LLP)

New Co Armonia SA

New Co Lirica SA

New Co Opera SA

New Co S32 SA

New Co Sinfonia SA

Norwegian Cardinal Ltd

Norwegian Compass Ltd.

Norwegian Cruise Co. Inc.

Norwegian Cruise Line Agência de Viagens Ltda.

Norwegian Cruise Line Group Italy S.r.l.

Norwegian Cruise Line Group UK Limited (formerly Prestige Cruise
Services (Europe) Limited)

Norwegian Cruise Line Holdings, Ltd. (NCLH)

Norwegian Cruise Line India Private Limited

Norwegian Dawn Limited

Norwegian Epic, Ltd.

Norwegian Gem, Ltd.

Norwegian Jewel Limited

Norwegian Pearl, Ltd.

Norwegian Sextant Ltd.

Norwegian Sky, Ltd.

Norwegian Spirit, Ltd.

Norwegian Star Limited

Norwegian Sun Limited

Norwegian USCRA, Ltd.

Nualy Investments Inc

O Class Plus One, LLC

O Class Plus Two, LLC

Oasis of the Seas Inc.

Ocean Bahamas Innovation Ltd.

Ocean Medallion Fulfillment, Ltd.

Oceanadventures S.A.

Oceania Cruises S. de R.L. (formerly Oceania Cruises, Inc.)

OCI Finance Corp.

Odds On Gaming Corporation

Odyssey of the Seas Inc.

Oliu, Pascual A. (Boies Schiller Flexner LLP)

Operadora Catalina S.r.L.

Orrick, Herrington & Sutcliffe LLP

Otazo-Reyes, Judge Alicia M. (United States Magistrate Judge for the
Southern District of Florida)

Ovation of the Seas Inc.

P&O Princess American Holdings

P&O Princess Cruises International Limited

P&O Princess Cruises Pension Trustee Limited

P&O Properties (California), Inc.

P&O Travel Limited

Palumbo Malta Shipyard Limited

Palumbo Shipyard Limited

Paul, Weiss, Rifkind, Wharton & Garrison LLP

Pegg, Allen P. (Hogan Lovells US LLP)

Pettlier, Romain Le

Piccapietra Finance S.r.l.

Ponce, Scott D. (Holland & Knight LLP)

Prestige Cruise Holdings S. de R.L. (formerly Prestige Cruise Holdings,
Inc.)

Prestige Cruise Services LLC

Prestige Cruises Air Services, Inc.

Prestige Cruises International S. de R.L. (formerly Prestige Cruises
International, Inc.)

Prestige Cruises Management S.A.M.

Prestige Cruises N.V.

Preziosa Cruise Limited

Pride of America Ship Holding, LLC

Pride of Hawaii, LLC

Princess Bermuda Holdings, Ltd.

Princess Cays Ltd.

Princess Cruise Corporation Inc.

Princess Cruise Lines, Ltd.

Princess Cruises and Tours, Inc.

Princess U.S. Holdings, Inc.

Quantum of the Seas Inc.

Quinn Emanuel Urquhart & Sullivan, LLP

Radiance of the Seas Inc.

RCI Holdings LLC

RCL (UK) Ltd.

RCL Cruise Holdings LLC

RCL Cruises Ltd.

RCL GEO LLC

RCL Holdings Cooperatief U.A.

RCL Horizon LLC

RCL Investments Ltd.

RCL Monarch LLC

RCL New Vessel Holding Company LLC

RCL Sovereign LLC

RCL TUI Cruises German Holding GmbH & Co. KG

RCL Worldwide (Hong Kong) Limited

RCL Worldwide Ltd.

RCL Zenith LLC

RCT Maintenance & Related Services S.A.

RCT Pilots & Related Services, S.A.

RCT Security & Related Services S.A.

Regatta Acquisition, LLC

Rhapsody of the Seas Inc.

Riviera New Build, LLC

Roatan Cruise Terminal S.A. de C.V.

Rosenkranz, E. Joshua (Orrick, Herrington & Sutcliffe LLP)

Rowen, Matthew D. (Clement & Murphy, PLLC)

Royal Caribbean Cruise Lines AS

Royal Caribbean Cruises (Asia) Pte. Ltd.

Royal Caribbean Cruises Services (China) Company Limited

Royal Caribbean Cruises, Ltd. (RCL)

Royal Hyway Tours, Inc.

Saieh, Sabrina S. (Colson Hicks Eidson, P.A.)

Saladrigas, Caitlin F. (Holland & Knight)

Santa Cruz Terminal, S.L.

Schultz, Meredith L. (Boies Schiller Flexner LLP)

Seabourn Cruise Line Limited

Seahawk One, Ltd.

Seahawk Two, Ltd.

SeaVacations Limited

SeaVacations UK Limited

Serenade of the Seas Inc.

Seven Seas Cruises S. De R.L., d/b/a Regent Seven Seas Cruises

SG Cruises GmbH

SG Expeditions Cyprus Limited

SG Expeditions SAGL

Shaffer, Derek L. (Quinn Emanuel Urquhart & Sullivan, LLP)

Shanghai Coast Cruise Consulting Co. Lda

Shanmugam, Kannon S. (Paul, Weiss, Rifkind, Wharton & Garrison LLP)

Ship Care (Bahamas) Limited

Silver Cloud Shipping Co. Ltd.

Silver Muse Shipping Co. Ltd.

Silver Shadow Shipping Co. Ltd.

Silver Spirit Shipping Co. Ltd.

Silver Wind Shipping Ltd.

Silversea Cruise Finance Ltd.

Silversea Cruise Holding Ltd.

Silversea Cruises (Europe) Ltd.

Silversea Cruises (UK) Ltd.

Silversea Cruises Australia Pty. Ltd.

Silversea Cruises Canada Ltd.

Silversea Cruises Ltd.

Silversea Cruises South Africa Pty. Ltd.

Silversea New Build Seven Ltd.

Silversea RCL Holdings LLC

Silversea SAM

Singer, Stuart H. (Boies Schiller Flexner LLP)

Sirena Acquisition

Sitmar Cruises Inc.

Sixthman Ltd.

SNC Fantasia Bail

SNC Splendida Bail

Societe Labadee Nord, S.A.

Spanish Cruise Services N.V.

Spectrum of the Seas Inc.

Spezia & Carrara Cruise Terminal Srl

Spohrer Dodd Trial Attorneys

SSC Finance Corp.

Sullivan, Kathleen M. (Quinn Emanuel Urquhart & Sullivan, LLP)

Summit Inc.

Sun Princess II Limited

Sun Princess Limited

Sunshine Shipping Corporation Ltd.

Super, John (Quinn Emanuel Urquhart & Sullivan, LLP)

Symphony of the Seas Inc.

T&T International, Inc.

Taormina, Benjamin A. (Holland & Knight LLP)

Terminal De Cruceros Punta Del Este SA

Torcatt Enterprises Limitada

Tour Alaska, LLC

Transnational Services Corporation

Tribe, Laurence H. (Harvard Law School)

Trident Insurance Company Ltd.

Trieste Adriatic Maritime Initiatives Srl

Venable LLP

Venezia Investimenti Srl

Vice, Abigail Frisch (Paul, Weiss, Rifkind, Wharton & Garrison LLP)

Vision of the Seas Inc.

Voyager of the Seas Inc.

Voyager Vessel Company, LLC

Wang, Jonas Q. (Orrick, Herrington & Sutcliffe LLP)

West Sicily Gates Srl

Westmark Hotels of Canada, Ltd.

Westmark Hotels, Inc.

Whisper SpA

Whitaker, Walter H.

White Sand Inc.

World Leading Cruise Management (Shanghai) Co., Ltd.

XP Tours S.A.

Norwegian Cruise Line Holdings, Ltd., a Bermuda company, files the following corporate disclosure statement:

Norwegian Cruise Line Holdings Ltd. is publicly traded on the New York Stock Exchange under ticker symbol “NCLH.” There are no parent corporations or publicly-held corporations that hold ten percent or more of Norwegian Cruise Line Holdings, Ltd.’s stock.

/s/ Derek L. Shaffer
Derek L. Shaffer

REQUESTED RELIEF

Pursuant to Eleventh Circuit Rule 32-4, Defendants-Appellants Norwegian Cruise Line Holdings, Ltd., MSC Cruises S.A. Co., MSC Cruises (USA), Inc., MSC Cruises, S.A., and Royal Caribbean Cruises, Ltd. (“Moving Appellants”) respectfully move for leave to file a joint opening brief of up to 20,000 words—an increase of 7,000 words from the 13,000-word limit in Federal Rule of Appellate Procedure 32(7)(B)(i).

GROUNDS FOR THE UNOPPOSED MOTION

This consolidated appeal involves four high-stakes disputes, each with a judgment exceeding \$100 million. The judgments raise novel and complex legal issues under the Helms-Burton Act, including multiple issues of statutory construction that will be ones of first impression in this Court. The complexity of the issues is reflected in the district court’s 168-page omnibus order on liability, *Havana Docks Corp. v. Carnival Corp.*, 592 F. Supp. 3d 1088 (S.D. Fla. 2022), plus additional orders on damages, *Havana Docks Corp. v. Carnival Corp.*, 2022 WL 3912516 (S.D. Fla. Aug. 31, 2022); *Havana Docks Corp. v. Carnival Corp.*, 2022 WL 3910707 (S.D. Fla. Aug. 31, 2022). These complexities alone supply “extraordinary and compelling reasons” to grant the requested word increase. *See* 11th Cir. R. 32-4.

The word-limit increase requested here is especially justified because granting it will substantially *reduce* the total words that the Moving Appellants are collectively entitled to—thereby streamlining the briefing for the benefit of the Court and the parties. As it currently stands, each Moving Appellant is entitled to file its own separate brief not exceeding 13,000 words, for a total of up to 39,000 words in three briefs. Instead of filing multiple briefs, the Moving Appellants are now requesting permission to file a *joint opening brief* not exceeding 20,000 words—a reduction of 19,000 words in the total word limit.

This ultimate word reduction, plus the underlying legal complexities, provide extraordinary and compelling reasons to grant the requested word increase.

STATEMENT OF CONSENT

Counsel for Plaintiff-Appellee Havana Docks Corporation consents to the relief sought by this Motion. The Moving Appellants will consent to a corresponding word-limit extension if requested by Plaintiff-Appellee.

TIMING

As required by Eleventh Circuit Rule 32-4, this motion has been filed seven days in advance of the June 30, 2023 due date for the Moving Appellants' opening briefs. Given that approaching deadline, the Moving Appellants respectfully request a ruling at the Court's earliest convenience.

CONCLUSION

For the above reasons, the Moving Appellants respectfully request that they be granted leave to file a joint opening brief not exceeding 20,000 words.

Dated: June 23, 2023

Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN LLP

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/s/ Derek L. Shaffer
Derek L. Shaffer
William A. Burck
Christopher G. Michel
Jonathan G. Cooper
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Counsel for Defendant-Appellant Norwegian Cruise Line Holdings, Ltd.

/s/ Paul D. Clement

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Chadwick J. Harper*
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(202) 742-8900
paul.clement@clementmurphy.com

*Supervised by principals of the firm
who are members of the Virginia bar

Counsel for Defendant-Appellant Royal Caribbean Cruises, Ltd.

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Jonas Q. Wang
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Washington, DC 20015

/s/ E. Joshua Rosenkranz

E. Joshua Rosenkranz
Katherine Munyan
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(212) 506-5000
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*Counsel for Defendants-Appellants MSC Cruises S.A. Co., MSC Cruises
(USA), Inc., and MSC Cruises, S.A.*

CERTIFICATE OF COMPLIANCE

In accordance with Federal Rules of Appellate Procedure 27(d)(1)(E), 27(d)(2)(A), and 32(g)(1), I certify that the foregoing motion is proportionately spaced using 14-point Times New Roman font and contains 414 words, excluding the parts of the motion exempted from length limits by Rules 27(d)(2) and 32(f).

/s/ Derek L. Shaffer
Derek L. Shaffer

CERTIFICATE OF SERVICE

I hereby certify that, on June 23, 2023, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. Court of Appeals for the Eleventh Circuit by using the appellate CM/ECF system. I further certify that all participants in the case are registered CM/ECF users and will be served by the appellate CM/ECF system.

/s/ Derek L. Shaffer
Derek L. Shaffer